

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

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| <b>IN RE: ETHICON, INC. PELVIC REPAIR<br/>SYSTEM PRODUCTS LIABILITY<br/>LITIGATION</b>  | <b>Master File No. 2:12-MD-02327<br/>MDL No. 2327</b> |
| <b>This Document Relates To:</b><br><br><i>Cheryl Berden et al., v. Ethicon, Inc. et al.</i><br><br><b>Case No. 2:14-cv-21966</b> | <b>JOSEPH R. GOODWIN<br/>U.S. DISTRICT JUDGE</b>      |

**DEFENDANTS’ OBJECTIONS AND RESPONSES TO PLAINTIFF’S  
“NOTICE OF VIDEO DEPOSITION OF AXEL ARNAUD”**

Defendants, Ethicon Inc. (“Ethicon”) and Johnson & Johnson (collectively, “Defendants”) hereby respond and object to Plaintiff’s “Notice of Video Deposition of Axel Arnaud” (the “Notice”). The Notice was filed and served on September 16, 2018 [Document 30].

Defendants object to this Notice on the grounds set forth in the Motion for Protective Order and incorporate the Motion herein by reference [Document 35]. Defendants further object to the Notice to the extent that it does not comply with applicable foreign law and rules regarding the taking of foreign depositions. Defendants further object to the Notice on the grounds that it is unduly burdensome and/or not proportional to the needs of the case. The objections contained herein are made without in any way waiving or intending to waive - but on the contrary reserving and intending to reserve - the right at any time to revise, supplement, correct or add to these

objections and responses.

Respectfully submitted,

/s/ William M. Gage

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COUNSEL FOR DEFENDANTS  
ETHICON, INC. AND JOHNSON & JOHNSON

**CERTIFICATE OF SERVICE**

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage  
William M. Gage